

COMPLAINT

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

Plaintiff,

Damien Shontell Hewlett

v.

Case No.

Defendant's,

Jason Hill, CO-Lange

(A) PARTIES

1. Plaintiff is a citizen of Wisconsin, and is located at Waupun Correctional Institution, 200 S. Madison St., P.O. Box 351, Waupun, WI, 53963.
2. Defendant's Jason Hill and CO-Lange is a citizen of Wisconsin and resides at an unknown address, but was working for the Wisconsin Department of Corrections at the time of incident and that address is Waupun Correctional Institution, 200 S. Madison St., P.O. Box 351, Waupun, WI, 53963.

(B) STATEMENT OF CLAIM

- On the date of September 19, 2022 I Damien Shontell Hewlett was an inmate at Waupun Correctional Institution as an inmate in Waupun Wisconsin. I was in the Restrictive Housing Unit on B-Range Upper in the Cell #B-217 as a CO-Lange was doing night

time medication pass. I had told CO-Lange that I was suicidal, and he just walked past me, and did not have his body camera on. At that point, Inmate-Carter whom was housed in the cell #B-218, had told CO-Lange "that man just said he suicidal", and CO-Lange had responded "he'll be okay". As this was occurring, I was beating my head on the door til my forehead was bleeding, and I had pressed my emergency call button and notified the CO in the bubble of my injury and that the CO-Lange had walked off on me, and this anonymous CO in the bubble tells me "glad to hear your alive". And a while later CO-Lange and CO-Jason Hill came to my cell door "without" their body camera's on, and began to harass, antagonize, and bully me into killing myself by the statements, and remarks that came out of CO-Jason Hill's mouth. When they came to my cell door CO-Hill had started in on me by looking at the injury to my forehead and then stating "that's it", I told him to pull me out and place me on OBS, at this point CO-Hill had literally said to me "Your Bitch Made", I was then appalled in my demeanor at what was occurring and literally had asked "CO-Hill" if he really just had called me a bitch, and CO-Hill responds "Yah and I don't care about your fear's of me," at

this time I had told him that that both him and Lange should turn their body camera's on, at which point CO-Hill replies to me "we don't care if our camera's aren't on and we don't care about you either - do you think me, CO-Lange, or the officer in the bubble care if you live or die - you could kill yourself tonight and nobody will care." At this point I had lost it and began slamming my head on the door again. At this point CO-Hill makes yet another cruel remark by saying to me literally "maybe we'll come back when your black and blue or on the brink of death bleeding out." Then both CO-Lange and CO-Hill had left me in my cell in a mentally distraught and unstable state of mind, as I continued to unravel mentally. I was in the room and continuously banged my head on the door, sliced up my left arm, then tied a noose round my neck as tight as I could. The next rotation of CO's on third shift had found me like this in the cell #B-217. And all of CO-Hill's actions were based upon a type of retaliatory nature based upon the fact that three days prior there was an incident where CO-Hill had slammed me while I was handcuffed and shackled, with so much force that I had vomited, and such carelessness for my safety because it occurred on the second tier and my head and upper chest at one point were

over the ledge of the range, on the date of 9/16/22. Although that's in a separate civil complaint of its own validity. And another issue had arose on that same day of 9-19-22 where CO-Lange and CO-Hill had literally lied through their teeth to a Superior officer Sergeant-Reynolds in order to manipulate and deny me my dinner tray. And the reality is that is an entirely separate civil complaint as well. But I bring them very instances to the court's attention solely due to the fact that it's like an ongoing pattern of CO-Jason Hill continuously violating my rights to establish the pattern that exists. And given the circumstances it's probable the court may even run these three separate civil claims side by side in the future. The Eighth Amendment and Fourteenth Amendment of my Constitutional Rights were violated and I seek damages from CO-Hill and CO-Lange for deliberate indifference to a serious medical need of suicide, harassment, retaliation, failure to intervene, failure to protect, and cruel and unusual punishment.

(C) JURISDICTION

- I am suing for a violation of federal law under 28 U.S.C. § 1331.

(D) RELIEF WANTED

- I'm seeking from each defendant in their official capacity, for they were employees of the State, and also their separate capacities from each co-Jason Hill and CO-Lange Separately. The damages I seek are \$500,000.00 for deliberate indifference to a serious medical need of suicide, \$500,000.00 in physical damages, \$500,000.00 in emotional damages, \$500,000.00 punitive damages, and \$500,000 in compensatory damages.

(E) JURY DEMAND

"YES"-I want a jury to hear my case.

- I declare under penalty of perjury that the foregoing is true and correct.

Complaint signed this 17 day of November, 2022

Respectfully Submitted,
Damien Shontell Hewlett

DOC # 559455

Waupun Correctional Institution
200 S. Madison St.

P.O. Box 351

Waupun, WI, 53963